

U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
FILED
JUN 08 2011
DAVID J. MALAND, CLERK
BY DEPUTY

IN THE UNITED STATES DISTRICT COURT JUN 08 2011
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

§
§
§
§
§

v.

No. 4:11CR 130
Judge Scheff

CLEO WILSON

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 29 U.S.C. § 501(c)
(Embezzlement of Assets)

Between in or about February 2007 and in or about September 2009, in the Eastern District of Texas, the defendant, **Cleo Wilson**, while an officer, that is, Financial Secretary of Steelworkers Local 1856, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use moneys, funds, securities, property, and other assets of this labor organization in the approximate amount of \$30,206.19.

In violation of 29 U.S.C. § 501(c).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461

As the result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461 all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned offenses, including but not limited to the following:

Cash Proceeds

Approximately \$30,206.19 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the foregoing offenses alleged in this Indictment.

Substitute Assets

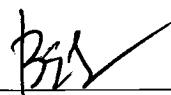
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

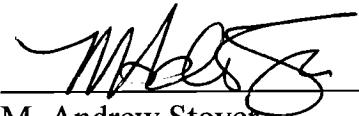
it is the intent of the United States, pursuant to 18 U.S.C. § 982(a)(4), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this Indictment, any and all interest the defendants have in the above-described property is vested in and forfeited to the United States.

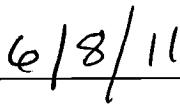
A TRUE BILL


GRAND JURY FOREPERSON

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Date

IN THE UNITED STATES DISTRICT COURT
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NOTICE OF PENALTY

Count One

Violation: 29 U.S.C. § 501(c)

Penalty: Not more than five years imprisonment, a fine not to exceed \$250,000, or twice any pecuniary gain to Defendant or gross loss to any victim(s) or both; supervised release of not more than three years.

Special
Assessment: \$100.00